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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.* individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
GOOGLE LLC'S REPLY ISO MOTION  
TO EXCLUDE SUNDAR PICHAI FROM  
TESTIFYING AT TRIAL [DKT 471]**

Date: May 9, 2025

Time: 2:00 p.m.

Ctrm: A – 15<sup>th</sup> Floor

Judge: Magistrate Judge Alex G. Tse

Action filed: July 14, 2020

Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, declare that:

2 1. I am an attorney licensed to practice law in the State of California and a partner with  
3 the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34<sup>th</sup> Floor San Francisco,  
4 California 94104, counsel for Defendant Google LLC (“Google”) in the above-captioned action. I  
5 have personal knowledge of each fact stated in this declaration, to which I could and would  
6 competently testify if called as a witness.

7 2. I submit this declaration in support of Google’s Reply in support of its Motion to  
8 Exclude Sundar Pichai from Testifying at Trial.

9 3. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt from the  
10 transcript of the Deposition of David Monesees, taken on September 15, 2022.

11 4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the transcript  
12 from the Deposition of Francis Ma, taken on October 28, 2022.

13 5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of the transcript  
14 from the Deposition of Eric Miraglia, taken on October 25, 2022.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is  
16 true and correct.

17 Dated: April 24, 2025

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/s/ Eduardo E. Santacana  
Eduardo E. Santacana